

EXHIBIT “A”

Howard N. Wiener, Esq., – Attorney ID #: 004031973
TOBIN, KESSLER, GREENSTEIN, CARUSO, WIENER & KONRAY
136 Central Avenue
Clark, NJ 07066
(732) 388-5454

Attorneys for Plaintiff, Judith Sloane

Plaintiff,

JUDITH SLOANE

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: Monmouth County
Docket No.: MON-L-187421

vs.

CIVIL ACTION

Defendant(s),
WALMART SUPERCENTER STORE
#5142 D/B/A/ WALMART., JOHN
DOE #1-10, JANE ROE #1-10, ABC
COMPANY #1-10, AND XYZ
MAINTENANCE COMPANY #1-10,
said names being fictitious

SUMMONS

From the State of New Jersey, to:

WALMART SUPERCENTER STORE #5142

The Plaintiff(s), named above, have filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/pro_se/10153_deptyclerklawref.pdf. If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, NJ 08625. A \$175.00 filing fee payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to Plaintiff's attorney whose name and address appear above, or to Plaintiff(s), if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief Plaintiff's demand, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

/s/ Michelle M. Smith, Esq., Clerk
MICHELLE M. SMITH, ESQ., CLERK

Date: June 8, 2021

ADDRESS FOR SERVICE:
Walmart Supercenter Store
Route 66
Neptune, New Jersey 07753

Howard N. Wiener, Esq.- ATTORNEY ID#: 004031973

TOBIN, KESSLER, GREENSTEIN, CARUSO, WIENER & KONRAY
136 Central Avenue
Clark, NJ 07066
(732) 388-5454
Attorneys for Plaintiff, Judith Sloane

Plaintiff,
JUDITH SLOANE

vs.

Defendant(s),

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MONMOUTH COUNTY

Docket No.:

CIVIL ACTION

WALMART SUPERCENTER STORE
#5142 d/b/a WALMART INC., JOHN
DOE #1-10, JANE ROE #1-10, ABC
COMPANY, #1-10, AND XYZ
MAINTENANCE COMPANY 1-10, said
names being fictitious

COMPLAINT, JURY DEMAND,
DESIGNATION OF TRIAL COUNSEL,
DEMAND FOR PRODUCTION OF
DOCUMENTS, DEMAND FOR ANSWERS
TO INTERROGATORIES

Plaintiff, Judith Sloane, residing at 5975 Trophy Drive,
Unit 1702 in the City of Naples, County of Collier and State of
Florida, by way of Complaint against the Defendants, says:

FIRST COUNT

1. On or about the 23rd day of November, 2019, Plaintiff,
Judith Sloane was lawfully in Walmart located at or about 3575
State Route 66 in the Township of Neptune, County of Monmouth
and State of New Jersey, owned, operated, maintained,
controlled, leased, secured, repaired and/or constructed by the
Defendant, Walmart Supercenter Store #5142 d/b/a Walmart Inc.,
individually and/or jointly and severally, in so negligent a
manner as to cause Plaintiff, Judith Sloane to slip and fall due
to produce on the floor and sustain personal injuries.

2. As a direct and proximate result of the negligence of the Defendant, Walmart Supercenter Store #5142 d/b/a Walmart Inc., aforesaid, Plaintiff suffered serious physical and emotional injuries of both a temporary and permanent nature, considerable pain, anguish and suffering, shock, loss of wages and other special damages.

WHEREFORE, plaintiff demands judgment against the Defendant on this Count for damages, interest and costs.

SECOND COUNT

1. Plaintiff repeats the allegations contained in the First Count of this Complaint and makes it a part hereof.

2. The Defendants, John Doe 1-10, Jane Roe 1-10, ABC Company, 1-10 and XYZ Maintenance Company, 1-10, said names being fictitious, are fictitious names intended to identify any and all parties, including individuals, corporations and/or other entities whose identities are presently unknown to the plaintiff, who together with the named defendants were responsible for the ownership, operation, control, lease, repair, construction and/or maintenance of the premises where the aforesaid accident occurred or who in anyway caused or contributed to Plaintiff's injuries.

3. As a direct and proximate result of the joint and several negligence of the Defendants aforesaid, Plaintiff suffered serious physical and emotional injuries of both a temporary and permanent nature, considerable pain, anguish and suffering, shock, loss of wages and other special damages.

WHEREFORE, Plaintiff demands judgment jointly, severally or in the alternative against all Defendants on this Count for damages, interest and costs.

TOBIN, KESSLER, GREENSTEIN,
CARUSO, WIENER & KONRAY, P.C.
ATTORNEYS FOR PLAINTIFF

DATED: 6/1/21

BY: 
HOWARD N. WIENER, ESQ.

JURY DEMAND

Plaintiff demands a trial by jury on all Counts in this Complaint.

TOBIN, KESSLER, GREENSTEIN,
CARUSO, WIENER & KONRAY, P.C.
ATTORNEYS FOR PLAINTIFF

DATED: 6/1/22

BY: 
HOWARD N. WIENER, ESQ.

DESIGNATION OF TRIAL COUNSEL

Please take notice that pursuant to R. 4:25-4, Howard N. Wiener, Esq., is hereby designated as trial counsel in the above captioned matter for the Law firm of Tobin, Kessler, Greenstein, Caruso, Wiener & Konray, P.C., Attorneys for the Plaintiff, Judith Sloane.

TOBIN, KESSLER, GREENSTEIN,
CARUSO, WIENER & KONRAY, P.C.
ATTORNEYS FOR PLAINTIFF

DATED:

6/1/21

BY:



HOWARD N. WIENER, ESQ.

DEMAND FOR ANSWERS TO INTERROGATORIES

Demand is hereby made on the Defendants to answer fully and responsively Uniform C and C(2) Interrogatories.

TOBIN, KESSLER, GREENSTEIN,
CARUSO, WIENER & KONRAY, P.C.
ATTORNEYS FOR PLAINTIFF

DATED:

6/1/21

BY:



HOWARD N. WIENER, ESQ.

CERTIFICATION


Pursuant to Rule 4:5-1, the undersigned hereby certifies that at the time of filing this Complaint, the matter in controversy is not the subject of other actions pending in any Court and/or Arbitration proceeding.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

TOBIN, KESSLER, GREENSTEIN,
CARUSO, WIENER & KONRAY, P.C.
ATTORNEYS FOR PLAINTIFF

DATED: 6/1/21

BY:



HOWARD N. WIENER, ESQ.

DEMAND FOR PRODUCTION OF DOCUMENTS

Pursuant to Rule 4:18-1, the plaintiff(s) hereby demands that the defendant produce the following documentation within thirty (30) days as prescribed by the Rules of Court.

Additionally, please be advised that the following requests are ongoing and continuing in nature and the defendant is, therefore, required to continuously update its responses thereto as new information or documentation comes into existence.

1. The amounts of any and all insurance coverage covering the defendants, including but not limited to, primary insurance policies, secondary insurance policies and/or umbrella insurance policies. For each such policy of insurance, supply a copy of the declaration page therefrom.

2. Copies of any and all documentation or reports, including but not limited to, police reports, accident reports and/or incident reports concerning the happening of the incident in question or any subsequent investigation of same.

3. Copies or duplicates of any and all photographs, motion pictures, videotapes, films, drawings, diagrams, sketches or other reproductions, descriptions or accounts concerning the individuals involved in the incident in question, the property damage sustained, the accident scene, or anything else relevant to the incident in question.

4. Copies of any and all signed or unsigned statements, documents, communications, and/or transmissions, whether in writing, made orally or otherwise recorded by any mechanical or electronic means, made by any party to this action, any witness, or any other individual, businesses, corporation, investigative authority or other entity concerning anything relevant to the incident in question.

5. Copies of any and all documentation, including but not limited to, safety manuals, statutes, rules, regulations, books, and/or industry standards which refer to, reflect or otherwise relate to the incident in question or any potential defense to the action in question.

6. Copies of any and all discovery received from any other parties to the action in question.

7. Copies of any and all reports on the plaintiff received by the defendant, or any other party to this suit, from either the Central Index Bureau (C.I.B.) or from any other source.

8. Copies of any and all medical information and/or documentation concerning the plaintiff in this matter whether it concerns medical condition or treatment which took place before, during or after the time of the incident in question.

9. Copies of any and all records of any type subpoenaed by the defendants or received from any other source concerning the plaintiff for the incident in question.

10. Please be advised that the plaintiff hereby objects to the taking of any photographs, x-rays or other reproductions concerning the plaintiff or the plaintiff's injuries at the time of the defense examination.

11. Copies of all cellular phone bills of any and all phones that each defendant had access to on the date of the subject accident.

TOBIN, KESSLER, GREENSTEIN,
CARUSO, WIENER & KONRAY, P.C.
ATTORNEYS FOR PLAINTIFF

DATED: 6/1/21

BY:


HOWARD N. WIENER, ESQ.

Civil Case Information Statement

Case Details: MONMOUTH | Civil Part Docket# L-001874-21

Case Caption: SLOANE JUDITH VS WALMART
SUPERCENTER STORE#514

Case Initiation Date: 06/01/2021

Attorney Name: HOWARD N WIENER

Firm Name: TOBIN KESSLER GREENSTEIN CARUSO
WIENER

Address: 136 CENTRAL AVENUE 3RD FLOOR
CLARK NJ 07066

Phone: 7323885454

Name of Party: PLAINTIFF : Sloane, Judith

Name of Defendant's Primary Insurance Company
(if known): Claims Management Inc.

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Are sexual abuse claims alleged by: Judith Sloane? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

06/01/2021
Dated

/s/ HOWARD N WIENER
Signed

